

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Erik Octavio VARELA-Lara, YOB: 1995 USC

CASE NUMBER: 7:19-MJ-0764

SEALED

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 11/27-11/29/2018 in Hidalgo county, in the Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and Intentionally Conspire to possess with Intent to Distribute approximately 5 kilograms or more of cocaine, a Schedule II Controlled Substance

Knowingly and Intentionally possess with Intent to Distribute approximately 12 kilograms of cocaine, a Schedule II Controlled Substance

in violation of Title 21 United States Code, Section(s) 841(a) (1), 846

I further state that I am a(n) DEA Task Force Officer and that this complaint is based on the following facts: See Attachment "A".

Continued on the attached sheet and made a part of hereof: ☒ Yes ☐ No

approved by
AVB KSD

Sworn to before me and subscribed in my presence,

April 3, 2019 2:55 p.m.
Date

Juan Alanis, U.S. Magistrate Judge
Name & Title of Judicial Officer

Gilberto M. Vazaldua
Signature of Complainant
Gilberto M. Vazaldua, DEA Task Force Officer

At McAllen, Texas
City and State

J. Alanis
Signature of Judicial Officer

ATTACHMENT A

On November 27, 2018, DEA HIDTA D-84 received information from a confidential source, hereinafter referred to as CS, who stated that Erik Octavio VARELA-Lara, hereinafter referred to as VARELA-Lara wanted to transport 10 kilograms of cocaine from the Rio Grande Valley area to Pennsylvania. The CS stated that VARELA-Lara wanted to rent a storage room, to store approximately 10 kilograms of cocaine. On this same date, DEA Agents followed VARELA-Lara and the CS to a storage unit in Pharr, Texas. Agents observed VARELA-Lara place a cardboard box inside the storage unit. VARELA-Lara and the CS then closed the unit and departed the location. DEA Agents remained at location and maintained constant surveillance on the storage unit.

On November 29, 2018, DEA Agents observed VARELA-Lara arrive at the aforementioned storage unit and placed the cardboard box inside his vehicle. VARELA-Lara was then seen by agents depart the storage unit and travel to a warehouse in Hidalgo, Texas. Once at the warehouse agents observed VARELA-Lara digging into large sandbags that were outside the warehouse, next to the loading docks.

At approximately 5:18 p.m., agents observed an Orange tractor/trailer arrived at the warehouse. Agents then observed a forklift load twelve (12) large sandbags into the trailer.

At approximately 6:30 p.m., agents observed the orange tractor depart the warehouse and travel eastbound on Military Rd. and then north on Alamo Rd., until merging onto Interstate 2. The orange tractor then traveled towards eastbound and arrived at the Love's Store in Donna, Texas, where it stayed for approximately one hour, before continuing towards Brownsville, Texas.

At approximately 9:15 p.m., Brownsville Police Department conducted a traffic stop on Interstate 2. Officers utilized a narcotics border patrol canine to conduct a search of the tractor and trailer. The K-9 gave a positive alert to the presence of narcotics emitting from the trailer. Officers conducted a search of the trailer and discovered ten (10) bundles, which tested positive for the properties and characteristics of cocaine, with an approximate gross weight of approximately 12.10 kilograms, concealed inside the sandbags.